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Daryl F. Koch, Remediation Manager
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SUBJECT: Request to Extend the Enforceable Milestone for Submitting the Draft V-Tanks Remedial Design/Remedial Action Work Plan, Addendum 3 for Phase 2 Chemical Oxidation Treatment of V-Tank Contents for Waste Area Group 1, Operable Unit 1-10- (FMDP-FFA/CO-05-128)

Dear Mr. Ceto and Mr. Koch:

This letter provides the request and good cause basis to extend the enforceable milestone for submitting the draft V-Tanks RD/RAWP Addendum 3 from March 31, 2005 to December 31, 2005. The current enforceable milestone was established in the V-Tanks RD/RA Scope of Work, Revision 0, September 2004.

The V-Tanks RD/RA Scope of Work (SOW) was finalized based on the assumption that chemical oxidation would be required for the V-Tank contents waste to meet treatment standards and the ICDF waste acceptance criteria (WAC). This assumption was based on a worst case condition where the tank contents were characteristically hazardous and where the underlying hazardous constituents (UHC) would require treatment. Under this original assumption a preliminary design for chemical oxidation treatment was prepared and reviewed with EPA and IDEQ in a tabletop meeting on September 8, 2004.

After the RD/RA SOW was issued, it was determined that the tank contents were not characteristically hazardous, thereby eliminating the need to treat UHCs. With no need to treat UHCs it was also determined that air sparging alone would likely treat the tank contents sufficiently to meet the applicable treatment standards and the ICDF WAC. As agreed by the Agencies, the air sparged waste will be sampled to verify that it is not characteristically hazardous. On this basis, implementing air sparging as Phase 1 treatment followed by solidification was accepted by the Agencies as having the potential to result in successful tank contents treatment thereby eliminating the need for Phase 2 chemical oxidation treatment.

To implement this approach an ESD has been issued. The V-Tanks RD/RAWP Addendum 2 has been revised to address Phase 1 treatment and subsequent sampling, and a new FSP to sample the waste after Phase 1 air sparging has been issued. To prove the design approach for solidification of treated tank contents, a mockup test will be performed using one or more solidification agents. And finally, a further revision to RD/RAWP Addendum 2 is being prepared to add solidification and disposal of the treated tank contents at ICDF.

If Phase 1 treatment is successful, V-Tank contents air sparging treatment, solidification, and disposal at ICDF will be completed in the period from March to June 2005 with a cost savings of approximately \$2.5 to 3.5 M. If Phase 1 treatment is not successful then Phase 2 chemical oxidation will be required and the V-Tanks RD/RAWP Addendum 3 will be prepared for Phase 2 chemical oxidation treatment. During the timeframe for RD/RAWP Addendum 3 preparation and installation and testing of the chemical oxidation treatment system, the consolidation system would be operated as necessary to keep the sludge solids in the V-Tank contents waste suspended.

With the recent development of the Phase 1 air sparging approach and the potential for not having to implement Phase 2 chemical oxidation, it is beneficial to delay preparation of Addendum 3 and to extend the enforceable milestone for submittal of the draft V-Tanks RD/RAWP Addendum 3 for chemical oxidation treatment from March 31, 2005 to December 31, 2005. This request for extension is based on good cause in accordance with Section XIII, Extensions, of the FFA/CO. While this letter requests the milestone extension, a provision will also be included in the aforementioned revision to RD/RAWP Addendum 2 that will eliminate the Addendum 3 milestone if Phase 1 treatment is successful.

Enclosed is an updated summary schedule for the V-Tanks Phase 1 Treatment and Site Remediation and a preliminary summary schedule for the RD/RAWP Addendum 3 and V-Tank Phase 2 Treatment. The preliminary schedule shows a planned submittal date for the RD/RAWP Addendum 3 of mid September 2005 and the proposed revised enforceable date of December 31, 2005. A working schedule for V-Tanks Phase 2 Treatment, based on detailed design of the chemical oxidation treatment system, will be provided in the draft RD/RAWP Addendum 3 submittal to the Agencies, if Phase 2 treatment is required. DOE will require the new Idaho Completion Project contractor to follow the schedules in affect when the contract is awarded.

This letter requests your agreement to extend the milestone as indicated above. While the milestone related to Phase 2 chemical oxidation treatment is extended, the completion date for V-Tanks site remediation (tank and contents removal, contaminated soil removal, and site backfill) remains accelerated by three years, from a timeframe of July 2007 to August 2004. Tank contents treatment, based on Phase 1 air sparging success, would remain accelerated about 18 months, from October 2006 to June 2005. Phase 2 chemical oxidation treatment, if required, is projected to complete in March 2006, still six months earlier than the previous October 2006 projection. These time frame comparisons are to the preliminary schedule provided to IDEQ and EPA in July 2003 during the development of the record of decision amendment for the new V-

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Tanks chemical oxidation remedy. If you have any questions regarding this issue, please contact me at 208-526-4392.

Sincerely,

Kathleen E. Hain

Kathleen Hain, CERCLA Lead
Facility and Material Disposition Project

Enclosures

cc: T. Livieratos, DEQ, 1410 N. Hilton, Boise, ID 83706
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